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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MIKE FIELDS,

Plaintiff

vs.

MARLYN RAMIREZ,

Defendant

Case No. 2:21-cv-02102-CDS-EJY

**ORDER GRANTING DEFENDANT'S  
UNOPPOSED MOTION TO EXTEND:  
(1) THE JANUARY 3, 2024, DEADLINE  
FOR PLAINTIFF TO SUPPLEMENT  
HIS PENDING MOTION FOR  
SUMMARY JUDGMENT; AND (2) FOR  
DEFENDANT TO FILE A MOTION  
FOR SUMMARY JUDGMENT  
(Second Request)  
[ECF No. 82]**

Defendant Marlyn Ramirez ("Defendant" or "Ms. Ramirez"), by and through her undersigned counsel, hereby moves the Court to extend the January 3, 2024, deadline for Plaintiff to supplement his pending motion for summary judgment (ECF No. 80) and the January 3, 2024, deadline for Defendant to file and serve her motion for summary judgment to January 24, 2024. Good cause exists for the requested extension. This is the second request by the parties for such an extension.

First, good cause exists for the requested extension because during the parties' November 15, 2023, depositions, the parties each identified additional information and documents that the parties have agreed to exchange by December 20, 2023, but have yet to exchange.

Second, good cause exists for the requested extension because one of Defendant's lawyers, Ms. Myers, must travel to Missouri the week of December 25 to assist in the care of her mother who has recently suffered an acute illness, and, in addition, Ms. Myers has substantial responsibilities to Defendant and to her co-counsel, Mr. Fountain, to assist with the preparation

1 of Defendant's motion for summary judgment.<sup>1</sup>

2 Third, good cause otherwise exists for the requested extension in light of the intervening  
3 Christmas holiday and the holiday and travel plans of the parties and their counsel.

4 On December 19, 2023, Defendant's counsel, Ms. Myers, and Plaintiff's counsel, Mr.  
5 Hatch, met and conferred with respect to Defendant's request for an extension of the foregoing  
6 deadlines. After discussion, however, while Plaintiff's counsel was unwilling to stipulate to the  
7 requested extension, Plaintiff's counsel indicated that Plaintiff would not oppose a motion filed  
8 by Defendant's counsel seeking the requested extension.

9 Accordingly, for the foregoing reasons, Defendant respectfully requests that the Court  
10 enter an order extending the January 3, 2024, deadline for Plaintiff to supplement his pending  
11 motion for summary judgment (ECF No. 80) and the January 3, 2024, deadline for Defendant to  
12 file and serve her motion for summary judgment to January 24, 2024, with opposition and reply  
13 briefing to follow in the ordinary course.

14 Dated: this 19th day of December 2023

15 HOWARD & HOWARD ATTORNEYS PLLC

16 By: /s/ Joanna M. Myers

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24 *Attorneys for Defendant Marlyn Ramirez*

25 **IT IS SO ORDERED:**

26   
UNITED STATES DISTRICT JUDGE

27 DATED: December 29, 2023

28 <sup>1</sup> Defendant's counsel have agreed to prepare, file, and serve the motion despite the fact that preparation of the motion falls outside the scope of the continued representation of Defendant ordered by the Court, which was limited to, *inter alia*, responding to Plaintiffs' motion for summary judgment. (See ECF No. 78) (transcript of proceedings).